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9 Attorneys for Defendants, WELLS FARGO &
10 COMPANY and WELLS FARGO BANK, N.A.

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION
15

16 SHAHRIAR JABBARI and KAYLEE
HEFFELFINGER, on behalf of themselves
17 and all others similarly situated,

18 Plaintiff,

19 vs.

20 WELLS FARGO & COMPANY and WELLS
FARGO BANK, N.A.,

21 Defendants.
22

Case No. 15-CV-02159 VC

**DECLARATION OF PATRICIA
KENNEDY IN SUPPORT OF MOTION
FOR PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

Judge: Hon. Vince Chhabria
Ctm.: 4
Date: N/A
Time: N/A

1 I, Patricia Kennedy, state and declare as follows:

2 1. I am a Senior Vice President of Wells Fargo Bank, N.A. ("Wells Fargo"). I have
3 been employed by Wells Fargo for approximately 19 years and my present position is Loan
4 Administration Area Manager.

5 2. In my current position, I am responsible for collection of negative balance amounts
6 (including charged off amounts) for consumer and small business checking and savings accounts.
7 I have had that responsibility since approximately 2009.

8 3. Wells Fargo does not report to the consumer credit reporting agencies (*i.e.*,
9 Transunion, Experian, and Equifax) when a consumer or small business deposit customer has a
10 negative account balance or an amount is charged off. That has been true at least as long as I
11 have been involved in deposit account collections.

12 4. Under certain circumstances, Wells Fargo will report customers with charged off
13 deposit account balances to Early Warning Services (and previously to ChexSystems). It is my
14 understanding that information gathered by these agencies, as opposed to the three consumer
15 credit reporting agencies referenced above, does not affect the consumer's credit score (such as a
16 FICO score).

17 5. Wells Fargo has not made reports to ChexSystems since June 2012. It is my
18 understanding that ChexSystems does not utilize information that was reported more than 5 years
19 previously. Accordingly, ChexSystems will not be utilizing information reported by Wells Fargo
20 after July 1, 2017.

21
22 I declare under penalty of perjury under the laws of the United States that the foregoing is
23 true and correct.

24 Executed June 12, 2017, at Salt Lake City, Utah.

25
26 By: 

27 Patricia Kennedy
28